

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
WILLIAM G. GIBBONS,

Plaintiff,

-against-

LEONARD FRONTON, D.O., STEVEN FEIN,
M.D., STERLING MEDICAL CORPORATION,
DEPARTMENT OF VETERANS AFFAIRS, and
THE UNITED STATES OF AMERICA,

Defendants.

----- X
ECF Case

07 Civ. 2801 (MGC)

DECLARATION OF
LARRY JOSEPH BRINKMAN

LARRY JOSEPH BRINKMAN, pursuant to 28 U.S.C. § 1746, declares the following under penalty of perjury:

1. I am currently employed as the Chief of Human Resources for the VA Medical Center in Miami, Florida ("Miami VA Medical Center"), a position I have held since December 2002. Prior to that, I worked as the Assistant Chief of Human Resources for the Miami VA Medical Center from 1995 until 2002. From 1985 until 1995, I worked as the Chief of Labor/Employee Relations at the Miami VA Medical Center.

2. My current duties as Chief of Human Resources for the Miami VA Medical Center include managing all Human Resources activity for the Miami VA, specifically, overseeing the hiring and termination of VA employees, overseeing employee benefits, compensation, and performance.

3. The Deerfield Beach is a Community Based Outpatient Clinic ("CBOC"), located in

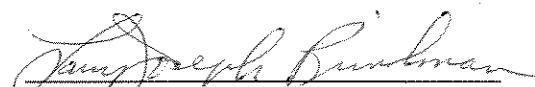
Deerfield Beach, Florida, which was administered by Sterling Medical Associates, Inc. ("Sterling"), during the time of the allegations raised in Plaintiff's Complaint, pursuant to a contract.

4. Records maintained by the Credentialing and Privileging Section of the Miami VA Medical Center indicate that Dr. Leonard Fronton has been a contract physician with Sterling Medical Associates since January 16, 2002, and that Dr. Steven S. Fine was a contract physician with Sterling Medical Associates from July 18, 2001, until August 5, 2002. These individuals are not currently, and were not during the time of the allegations in Plaintiff's Complaint, employees of the Miami VA Medical Center. They did not receive salaries or benefits from the Miami VA Medical Center.

5. Hiring decisions relating to Drs. Fronton and Fine were not made by the Miami VA Medical Center. The Miami VA Medical Center does not maintain official personnel folders for these individuals. The only information the VA Medical Center maintains relating to these individual doctors is credentialing and privileging information, used largely for security purposes.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
July 17, 2007


LARRY JOSEPH BRINKMAN